
REESE LLP

VIA ECF

August 31, 2022

Honorable Brian M. Cogan
United States Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Sharpe v. A&W Concentrate Co. et al.*
Case No. 19-cv-00768-BMC

Dear Judge Cogan:

Along with co-counsel, my firm represents plaintiffs and the certified class in the above-referenced action. We make this submission pursuant to I.E. of Your Honor's Individual Practices.

Russ Falconer of Gibson Dunn & Crutcher LLP has been recently retained as counsel for defendants A&W Concentrate Co. and Keurig Dr. Pepper Inc. ("Defendants") and has moved to be admitted *pro hac vice* in this matter. He has reviewed this letter and agrees to its content and the relief it seeks.

In connection with Defendants' retention of Mr. Falconer as new counsel for Defendants, the parties have recently engaged in settlement discussions and have agreed to a mediation with the Honorable Wayne Andersen (Ret.) of JAMs, which will occur on November 16, 2022.

The Parties believe that a stay of this action until November 30, 2022 would enhance the chances of settlement and allow the Parties to focus their efforts on settlement without requiring additional resources of the Court.

Accordingly, the Parties respectfully request a stay of this matter until November 30, 2022, at which point the Parties will report back to the Court the result of the mediation.

This is the first request by the Parties for a stay pending mediation.

Respectfully submitted,



Michael R. Reese

cc: All counsel of record, via CM/ECF